

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Pacific Capro Industries, d/b/a Capro
Industries,

Plaintiff(s),

v.

Global Advantage Distribution Warehouse,
LLC d/b/a Global Advantage Distribution
Warehouse, Inc., Global Advantage
Distribution, Inc., Global Advantage Holding,
LLC, Matthew J. Crawley, Kevin C. Snow
and Eric C. Gibson,

Defendant(s).

Docket No.: 04:08-cv-4155-RBH

**MOTION TO AMEND
SCHEDULING ORDER**

**TO: LAWRENCE B. ORR, ESQUIRE, ATTORNEY FOR DEFENDANTS
GLOBAL ADVANTAGE DISTRIBUTION WAREHOUSE, LLC D/B/A GLOBAL
ADVANTAGE DISTRIBUTION WAREHOUSE, INC., GLOBAL ADVANTAGE
DISTRIBUTION, INC., GLOBAL ADVANTAGE HOLDING, LLC AND
MATTHEW J. CRAWLEY AND BROWN W. JOHNSON, ESQUIRE,
ATTORNEY FOR DEFENDANTS KEVIN C. SNOW AND ERIC C. GIBSON**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, by and through the undersigned counsel, will move before the Court for an order amending the scheduling order heretofore entered in accordance with the proposed Consent Amended Scheduling Order submitted simultaneously herewith, a copy of which is attached hereto as Exhibit A. For the reasons set forth below, the parties request additional time to engage in discovery and conduct trial preparation. This Motion is based on the following grounds:

1. Counsel Darra James Coleman has just returned from an extended medical leave due to pregnancy complications and maternity leave and as such requires

additional time to comply with the deadlines set forth within the scheduling order heretofore entered by this Court.

2. On or about August 24, 2009, Lawrence Orr, Esquire, counsel for Defendants Global Advantage Distribution Warehouse, LLC d/b/a Global Advantage Distribution Warehouse, Inc., Global Advantage Distribution, Inc., Global Advantage Holding, LLC and Matthew J. Crawley, filed a Motion to be Relieved as Counsel. A hearing on this Motion is scheduled for November 3, 2009.
3. On or about October 7, 2009, Julie Moose, Esquire, former counsel for Defendants Kevin C. Snow and Eric C. Gibson filed a Motion to be Relieved as Counsel. On October 23, 2009, this Court granted counsel's motion and issued an Order substituting Brown Johnson as counsel for Defendants Snow and Gibson.
4. Due to the preceding circumstances, the parties require additional time so as to allow all Defendants to obtain counsel and to provide all parties with an equal opportunity to fully engage in discovery and conduct other necessary trial preparation.

WHEREFORE, for the foregoing reasons, the parties respectfully request the Court to amend the scheduling order in accordance with the proposed Consent Amended Scheduling Order simultaneously submitted herewith, a copy of which is attached hereto as Exhibit A.

Respectfully submitted,

ROGERS TOWNSEND & THOMAS, PC

s/Darra J. Coleman

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